

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION

DONNA DORSEY DAVIS,)	
as an individual and derivatively upon behalf of)	
I-65 Properties, Inc.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 2:06cv766-MHT
)	
RICHARD M. DORSEY,)	
as an individual,)	
)	
Defendant.)	
)	

VOIR DIRE QUESTIONS PROPOSED BY PLAINTIFF

Plaintiff, by her undersigned attorney, respectfully requests that prospective jurors in the above-styled case be asked the following questions in the course of their voir dire examination:

1. Plaintiff in this case is Donna Dorsey Davis. Donna Davis used to live in Birmingham, Alabama, but is now a resident of Clemson, South Carolina. She is a retired schoolteacher from the Birmingham City School system. Do any of you know Donna Dorsey Davis or any of her family members? Are any of you related to Donna Dorsey Davis? Were you, or any of your family members, taught by Mrs. Davis?
2. Plaintiff's attorneys are James E. Roberts, a solo practitioner and Lindsay Erwin who is of the law firm Meacham, Earley and Fowler. Do any of you know these attorneys? Have either of them, or any members of the law firm Meacham Early and Fowler ever represented you or any members of your family?
3. The Defendant in this case is Richard M. Dorsey. Mr. Dorsey resides in Prattville, Alabama. He owns a car dealership formerly known as Dorsey Motor Sales. Are any of you familiar with the Defendant? Do you know him or any members of his family? Are you related to the Defendant?
4. Do any of you know a local attorney, Mr. Robert Faulk, of Prattville, AL?
5. Were any of you aware of the case of Dorsey v. Dorsey, wherein Mr. Robert Faulk brought an action against the Defendant, Mr. Dorsey, alleging that he had wrongfully taken property from his mother while she was not competent?

6. Have you or any members of your family ever worked for Mr. Dorsey, Dorsey Motor Sales, or Victory Motor Company?
7. The attorney representing the Defendant is Clifford Cleveland of the firm Cleveland & Colley in Prattville, Alabama. Have any of you ever been represented by Mr. Cleveland or any member of Cleveland & Colley?
8. Do any of you know anything or have any of you heard anything about the dispute between Plaintiff and the Defendant which brought about this lawsuit?
9. The Plaintiff and Defendant are sister and brother. Their parents were Richard T. Dorsey and Ann Madre Dorsey. Did any of you know their parents?
10. Do any of you own stock in a corporation? If so, is the corporation closely-held, meaning less than 500 stockholders? Do you serve, or have you ever served, on the Board of Directors?
11. Have any of you ever been involved in a property dispute?
12. Do any of you own real property, other than your personal residence, with another person or as a member of a partnership or corporation?
13. Do any of you believe that a relative, such as in this case, a brother and a sister, have a greater duty to each other to act fairly and deal openly with their sibling?
14. Are any of you familiar with the property owned by I-65 Properties, Inc. located at the intersection of I-65 and Cobb Ford Road?
15. Do any of you feel you would have a problem rendering a punitive damage verdict against Mr. Dorsey, Mrs. Davis' brother, if the evidence shows that Mr. Dorsey acted wrongfully and committed a breach of a fiduciary duty or was negligent to his sister, Mrs. Davis?

Respectfully submitted,

//s// Lindsay B. Erwin
Lindsay B. Erwin, Esq.
ASB-5299-Y59E
Attorney for Plaintiff

Meacham, Earley & Fowler, P.C.
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Columbus, GA 31904
(706) 576-4064

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using electronic filing system which will send information of such filing to the following:

Clifford W. Cleveland
Cleveland & Colley, P.C.
P.O. Box 680689
Prattville, AL 36068

James E. Roberts, Esquire
4908 Cahaba River Road, Ste 204
Birmingham, AL 35243

//s// Lindsay B. Erwin
OF COUNSEL